## **Fact Sheets and Information Papers**



## **Management of Flameless Ration Heaters**

## March 2005

- **1. BACKGROUD**: Flameless ration heaters (FRHs) are flat cardboard pads included within Meals, Ready-to-Eat (MRE) ration packages. They consist of approximately 8 grams of magnesium which reacts with water to produce an exothermic reaction, which in turn warms the rations. In certain circumstances, soldiers consume individual MREs without activating the accompanying FRH. These unused FRHs have no value to the soldier and are typically discarded or collected for turn-in.
- **2. REGULATORY STATUS**: In a letter, dated 29 October 2004, to the Deputy Assistant Secretary of the Army (Environmental, Safety and Occupational Health), Mr. Raymond J. Fatz, the Environmental Protection Agency (EPA) has made the following clarifications:

**Single FRH -** Unused or used FRHs disposed of by individual soldiers in the field, or a residential setting, may be discarded as general solid waste IAW the household hazardous waste (HW) exclusion in 40 CFR 261.4(b)(1). This exclusion also applies to FRHs that are collected from a group of soldiers for disposal or reuse, as long as the FRHs were initially issued to a soldier for individual use.

**Multiple, Unused MREs Containing FRHs -** Waste MREs containing FRHs that were **not** issued to soldiers are not eligible for the household HW exclusion because the waste MREs were not generated by individuals; however, the EPA has determined that waste MREs containing FRHs are not considered to be HW under the Resource Conservation and Recovery Act (RCRA) and may be disposed as general solid waste.

**Multiple, Unused FRHs -** Multiple, unused FRHs **not** packaged with MREs and that have never been issued to a soldier present an ignitable hazard and must be managed as a RCRA HW when disposed.

**3. STATE/LOCAL REQUIREMENTS:** Because these guidelines are from the Federal EPA, States authorized to manage their own HW programs may still classify unused FRH as HW irregardless of whether they were issued to an individual soldier or not. Installation Environmental Offices should be contacted to find out what individual State interpretations are on this subject.

Further questions regarding this issue may be directed to Dominique Lowrance-Snyder or Richards Price at DSN 584-3651 or commercial (410) 436-3651.

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